

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 24-MJ-603

**SHABON BANKS
AMANDA REEVES
CHAD LEWIS, JR.
CHANC LEWIS
DOMINIC SPRAGUE
and JAMES CIVILETTI,**

Defendants

CRIMINAL COMPLAINT

I, JOSHUA ALDINGER, state that the following is true to the best of my knowledge and belief: that between approximately December 7, 2021, and October 8, 2024, in the Western District of New York and elsewhere, the defendants, SHABON BANKS, AMANDA REEVES, CHAD LEWIS, JR., CHANC LEWIS, DOMINIC SPRAGUE, and JAMES CIVILETTI, knowingly and willfully violated and conspired to violate the following statutes:

1. 18 U.S.C. § 1343 (Wire fraud);
2. 18 U.S.C. § 1349 (Conspiracy to commit wire fraud);
3. 18 U.S.C. §§ 2314 and 2315 (Transportation and sale of stolen goods in interstate commerce);
4. 18 U.S.C. §§ 1956(a)(l)(A)(i), 1956(h) and 1957 (Money laundering); and
5. 18 U.S.C. § 371 (Conspiracy to commit the above-listed offenses).

I also allege that in furtherance of the crimes listed above, SHABON BANKS, in her individual capacity, has committed Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A.

This Criminal Complaint is based on these facts: SEE ATTACHED AFFIDAVIT OF TASK FORCE OFFICER JOSHUA ALDINGER.

- Continued on the attached sheet.



JOSHUA ALDINGER
Task Force Officer
U.S. Department of Homeland Security
Homeland Security Investigations

Affidavit and Criminal Complaint submitted electronically by email in .pdf format. Oath administered, and contents and signature, attested to me as true and accurate telephonically pursuant to Fed.R.Crim. P. 4.1 and 4(d) on:

Date: October 11, 2024

City and State: Rochester, New York



MARK W. PEDERSEN
UNITED STATES MAGISTRATE JUDGE

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE)
CITY OF ROCHESTER)

I, JOSHUA ALDINGER, being duly sworn, depose and state:

1. I am a Deputy with the Monroe County Sheriff's Office (MCSO) and am currently assigned as a Task Force Officer (TFO) with Homeland Security Investigations (HSI). As a TFO, I am responsible for investigating federal crimes, to include wire fraud, money laundering, aggravated identity theft, conspiracy, and other federal criminal violations. Through my training and experience, I am familiar with the methods, routines, and practices of individuals involved in theft and fraud schemes.

2. I submit this affidavit in support of a criminal complaint charging Shabon Banks (BANKS), Amanda Reeves (REEVES), Chad Lewis, Jr. (LEWIS, JR.), Chanc Lewis (LEWIS), Dominic Sprague (SPRAGUE), and James Civiletti (CIVILETTI), with violating, and conspiring to violate, the following statutes between approximately December 7, 2021, and October 8, 2024, in the Western District of New York:

- a. 18 U.S.C. § 1343 (Wire fraud);
- b. 18 U.S.C. § 1349 (Conspiracy to commit wire fraud);
- c. 18 U.S.C. §§ 2314 and 2315 (Transportation and sale of stolen goods in interstate commerce);
- d. 18 U.S.C. §§ 1956(a)(l)(A)(i), 1956(h), and 1957 (Money laundering); and
- e. 18 U.S.C. § 371 (Conspiracy to commit the above-listed offenses).

3. I also allege that in furtherance of the crimes listed above, Shabon BANKS, in her individual capacity, has committed Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A.

4. The information contained in this affidavit is based upon evidence gathered through an investigation conducted by the Greece Police Department (GPD), MCSO, HSI, and the Internal Revenue Service (IRS). Because this affidavit is being submitted for the limited purpose of establishing probable cause to support a criminal complaint, I have not included every fact known to law enforcement as a result of this investigation. Rather, I have set forth the facts that I believe are relevant to establish probable cause to support a criminal complaint.

SUMMARY OF INVESTIGATION

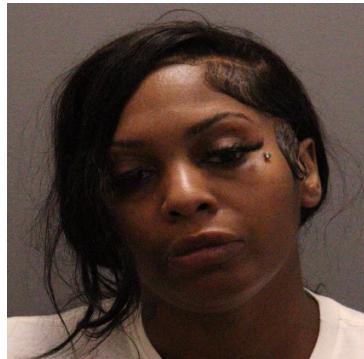
5. In November 2023, the GPD commenced an investigation after it became aware that serial larcenist, Shabon BANKS, had been engaged in an unusually large number of transactions at the New York Gold Diamond Pawn shop (NYGDP) in Greece, NY.

6. The investigation, which was joined by the MCSO, HSI, and IRS, has since revealed that a theft ring involving BANKS, REEVES, LEWIS, JR., and LEWIS (the LARCENISTS), have been engaged in an ongoing retail theft conspiracy involving NYGDP and its operators, SPRAGUE and CIVILETTI, since December 2021. As part of the scheme, the LARCENISTS steal new-in-box items from store shelves, which they sell to SPRAGUE, CIVILETTI, and others at NYGDP, for a fraction of the actual retail value. SPRAGUE and CIVILETTI then resell the stolen merchandise on eBay at much higher prices, resulting in significant profits to NYGDP.

7. Since December 7, 2021, NYGDP has purchased 37,936 new-in-box items from the LARCENISTS on more than 670 occasions, for which NYGDP has paid the LARCENISTS \$290,000.00. The investigation has revealed that NYGDP paid the larcenists 30% of the actual retail value of the stolen items. Therefore, the actual losses to the victim-retailers and resulting profit to NYGDP are estimated to be much higher.

THE LARCENISTS

Shabon Banks



8. BANKS has an uninterrupted criminal history involving larceny and possession of stolen property, dating back to at least 2002. According to records obtained through this investigation, BANKS has been arrested on at least 29 occasions. BANKS has 13 misdemeanor convictions and one felony conviction. BANKS' charges overwhelmingly involve larceny, but have also included assault, criminal contempt, and obstructing governmental administration. BANKS has served sentences which have included local jail, state prison, conditional discharges, and terms of probation. BANKS has a history of probation violations and bench warrants. BANKS also has a documented history of fleeing police, to include high-speed chases in 2022 and 2024, which were discontinued for safety reasons, and a 2018 high-speed chase involving a serious motor vehicle accident following a

larceny in Amherst, NY. In that case, BANKS reached estimated speeds of 95 mph in a 45-mph zone in heavy traffic before colliding with another vehicle.

9. BANKS has been observed coordinating with others, to include the LARCENISTS, to engage in organized retail theft. BANKS is also known to use sophisticated means to commit larcenies, to include the use of lined bags and aluminum foil to avoid theft detection systems; driving with her trunk open to obscure her license plate number from store surveillance systems; carrying receipts from other purchases in her hand when exiting stores to create the appearance of payment; and hiding merchandise under large items, such as furnace filters, when exiting stores to distract store employees. During the course of this investigation, BANKS has also been observed changing her appearance when committing multiple larcenies at a single retailer in the same day. When confronted by law enforcement, BANKS is known to feign injury or illness to avoid arrest.

10. BANKS arrest history significantly underrepresents the scope of her criminal activity. This investigation – which was narrowly focused on 5 select retailers in Monroe and some neighboring counties - has revealed that BANKS has committed at least 138 thefts between 2018 and 2024, for a total known loss of approximately \$96,444.93 in actual larceny, and at least \$19,605.59 in attempted larceny. Even this number underrepresents BANKS total theft, because it only reflects the loss known to the select retailers involved in this investigation through store surveillance video and other means. BANKS alone was responsible for an estimated \$230,000 in pawn transactions at NYGDP involving new-in-box items between December 2021 and February 19, 2024, indicating that her theft far exceeds that which has been confirmed by the retailers represented in this investigation.

Amanda Reeves



11. REEVES and BANKS are long-time accomplices. Like BANKS, REEVES also has an uninterrupted criminal history involving larceny spanning more than 20 years. According to records obtained through this investigation, REEVES has been arrested on approximately 27 occasions since 2002, with her last arrest taking place in May 2024. REEVES has been convicted of 10 misdemeanors and 2 felonies, and has served sentences which have included local jail, conditional discharges, and terms of probation. REEVES' charges have overwhelmingly involved larceny, but have also included assault, endangering the welfare of a child, menacing with a firearm, criminal contempt, unlawfully fleeing police, obstructing governmental administration, the use of counterfeit money, possession of forged instruments, resisting arrest, possession of stolen property, and burglary.

12. Like BANKS, REEVES also has a documented history of fleeing police, to include a high-speed chase in January 2024, in which REEVES fled from a Gates Police Officer after a suspected larceny at Home Depot. According to Gates PD, REEVES fled the officer through the Town of Gates in her Dodge Durango (a vehicle identified in this investigation) exceeding speeds of 80 mph in a 40-mph zone. REEVES passed multiple

vehicles during the chase and ran a red light, nearly causing at least two collisions. REEVES is also reported to have fled police in vehicles in 2019 and 2003.

13. REEVES has involved her son, CHAD LEWIS, JR. in theft since at least 2016, when LEWIS, JR. was 12 years old. For example, on December 15, 2016, REEVES was arrested for stealing approximately \$1,189.00 in inventory from Ulta Beauty in Amherst, NY. LEWIS, JR., who was 12 years old at the time, was observed by store employees acting as a lookout and attempting to block employees' view of REEVES as she concealed merchandise. Amherst Police attempted to stop a vehicle in which REEVES and LEWIS, JR. were traveling, however, that vehicle fled. The vehicle stopped at one point, at which time REEVES and LEWIS, JR. got out of the car. Their accomplice, the driver of the vehicle, then continued to lead police on a high-speed chase through the Town of Amherst. According to reports, REEVES and LEWIS, JR. were disorderly, refusing to follow police commands when they were apprehended. REEVES was ultimately arrested for multiple charges, including endangering the welfare of a child, possession of burglar tools, and grand larceny.

14. BANKS and REEVES have worked in concert to perpetrate retail theft for at least 20 years. For example, in 2004, REEVES and BANKS were arrested by Gates Police after they attempted to steal clothing items from a retail store by concealing them in storage bins. REEVES was convicted of attempted petit larceny and sentenced to 8 days in local jail. BANKS was convicted of petit larceny and sentenced to probation (which BANKS later violated).

15. In 2005 REEVES and BANKS were arrested together after attempting to steal merchandise from Home Depot. Both were convicted of attempted petit larceny and sentenced to conditional discharges.

16. In 2018 REEVES and BANKS were arrested together by Greece Police for stealing \$784.00 of merchandise from Walmart.

17. On November 3, 2018, REEVES and BANKS were arrested together in Wyoming County after they were observed stealing trail cameras, hover boards, range finders, game cameras and other items from Walmart for a total loss of \$1,735. Both pled guilty to petit larceny, paid restitution and received conditional discharges.

18. On December 7, 2023 (discussed in more detail below), BANKS, REEVES and LEWIS, JR. were observed stealing more than \$2,600.00 of merchandise from Lowes in Henrietta. Surveillance footage of this incident shows REEVES, LEWIS, JR. and BANKS arrive to the location at the same time, but park in different areas of the parking lot. Footage from inside the store shows REEVES, LEWIS, JR., and BANKS loading merchandise and communicating, before exiting separately without making payment. REEVES and LEWIS, JR. then left the parking lot in REEVES Dodge Durango and BANKS left separately in her vehicle.

19. As detailed below, physical surveillance, covert camera footage, and GPS information demonstrate that BANKS, REEVES, and LEWIS, JR. have consistently worked together to commit larcenies, and are currently involved in a conspiracy to sell stolen goods to NYGDP.

20. In total, REEVES has been involved in at least 44 thefts between 2018 and 2024, for a total known loss of at least \$35,690.73, and at least \$9,314.35 in attempted loss.

Chad Lewis, Jr.



21. Chad LEWIS, JR. is Amanda REEVES adult son. As referenced above and detailed below, LEWIS, JR. has been involved in theft with REEVES since he was a child. LEWIS, JR. has consistently worked in concert with REEVES and BANKS to perpetrate retail theft and sales to NYGDP during this conspiracy. In addition to the December 7, 2023, incident involving BANKS and REEVES detailed above, LEWIS, JR. was the subject of an investigation by Gates Police on August 5, 2024, when he was observed stealing water filters from the Gates Home Depot with REEVES. LEWIS, JR. fled the store on foot, and REEVES attempted to leave store property in her Dodge Durango, but was stopped by Gates PD. During an ensuing interview, REEVES claimed that LEWIS, JR. was her “nephew,” and admitted to knowing “Shabon” but claimed she no longer stole with Shabon, who REEVES characterized was “a big booster.” REEVES went on to claim that Chad LEWIS, JR. did not steal from Home Depot and blamed Shabon for “bringing him there.”

22. LEWIS, JR. is currently indicted by the Monroe County Grand Jury for Robbery in the First Degree, related to an incident in which he is alleged to have committed a gunpoint robbery on April 3, 2024, in the City of Rochester.

23. During this investigation, LEWIS, JR. was observed to be personally engaged in at least 18 different theft incidents (including completed and attempted thefts), for a total known loss of at least \$23,378.62 and attempted loss of at least \$1,070.80. This number likely underrepresents LEWIS, JR.'s total theft, because it only reflects the loss known to the select retailers involved in this investigation. LEWIS, JR. alone was responsible for an estimated \$46,277.00 in pawn transactions at NYGDP involving new-in-box items between January 5, 2022, and April 6, 2024, indicating that, like BANKS, LEWIS, JR.'s theft far exceeds that which has been confirmed by the retailers represented in this investigation.

Chanc Lewis



24. Chanc LEWIS is Amanda REEVES' adult relative (presumed to be REEVES' niece), and cousin of Chad LEWIS, JR. Chanc LEWIS is not known to have personally engaged in theft, however, beginning on March 28, 2024, Chanc LEWIS has engaged in approximately 37 sales of new-in-box merchandise to NYGDP for \$14,845.00.

25. As part of the investigation, law enforcement obtained video surveillance and theft reports from Target, Home Depot, Lowes, Walmart, and Kohls, primarily in the Rochester, NY area, in which the LARCENISTS were captured on store surveillance video committing and attempting to commit theft, both alone and in concert with one another. The investigation revealed that the LARCENISTS committed at least 162 confirmed thefts and attempted thefts between August 4, 2018, and September 24, 2024, for a total confirmed loss of \$111,981.87, and an attempted loss of \$23,540.57. Because the LARCENISTS continue to steal on a daily basis these numbers continue to grow. At least 111 of the confirmed larcenies took place during the period of the conspiracy involving NYGDP, during which period the LARCENISTS routinely sold the stolen goods to NYGDP, including to SPRAGUE and CIVILETTI who resold them on eBay via their “ampletools” eBay account.

26. Details concerning the specific, confirmed thefts and attempted thefts committed by the larcenists are summarized in the chart below:

Date	Time	Suspects Involved	Retail Store	Estimated Amount of Larceny	Estimated Amount of Attempted Larceny
8/4/2018	14:30	SHABON BANKS	TARGET	\$2,747.75	
8/15/2018	17:20	SHABON BANKS	TARGET	\$1,109.91	
8/15/2018	17:20	SHABON BANKS	TARGET	\$232.98	
8/17/2018	14:30	SHABON BANKS	TARGET	\$2,911.49	
8/18/2018	17:30	SHABON BANKS	TARGET	\$1,057.80	
8/18/2018	21:16	SHABON BANKS	TARGET	\$1,219.70	
8/19/2018	18:00	SHABON BANKS, AMANDA REEVES	TARGET	\$2,537.58	
8/20/2018	22:04	SHABON BANKS	TARGET	\$579.80	
8/20/2018	16:00	SHABON BANKS, AMANDA REEVES	TARGET	\$1,440.93	

8/21/2018	14:45	SHABON BANKS, AMANDA REEVES	TARGET		\$542.99
8/25/2018	18:22	SHABON BANKS	TARGET	\$896.96	
8/27/2018	13:45	SHABON BANKS	TARGET	\$1,131.90	
9/13/2018	12:00	SHABON BANKS	TARGET	\$1,199.83	
11/5/2018	17:41	SHABON BANKS, AMANDA REEVES	TARGET		\$552.75
11/12/2018	16:40	SHABON BANKS, AMANDA REEVES	TARGET		\$2,871.90
12/9/2018	16:46	SHABON BANKS	TARGET	\$1,699.87	
12/12/2018	22:35	SHABON BANKS	TARGET	\$1,139.88	
12/12/2018	15:47	SHABON BANKS	TARGET		\$171.46
12/12/2018	16:58	SHABON BANKS, AMANDA REEVES	TARGET	\$2,899.70	
12/16/2018	20:47	SHABON BANKS	TARGET	\$349.99	
12/17/2018	20:22	SHABON BANKS, AMANDA REEVES	TARGET		\$1,411.73
12/17/2018	22:25	SHABON BANKS, AMANDA REEVES	TARGET	\$719.91	
12/19/2018	20:16	SHABON BANKS	TARGET		\$39.98
12/29/2018	11:26	SHABON BANKS	TARGET	\$299.99	
1/27/2019	13:38	SHABON BANKS	TARGET	\$1,119.93	
2/2/2019	14:29	SHABON BANKS	TARGET	\$1,779.79	
2/3/2019	19:35	SHABON BANKS	TARGET		\$131.32
2/3/2019	14:02	SHABON BANKS	TARGET	\$879.90	
2/4/2019	10:15	SHABON BANKS	TARGET	\$569.89	
6/2/2019	13:02	AMANDA REEVES	TARGET	\$750.95	
6/4/2019	20:30	AMANDA REEVES, CHAD LEWIS JR	TARGET	\$2,536.73	
6/15/2019	12:00	AMANDA REEVES	TARGET		\$748.95
7/25/2019	15:24	AMANDA REEVES, CHAD LEWIS JR	TARGET		\$798.97
8/3/2019	13:00	AMANDA REEVES	TARGET		\$845.91
8/8/2019	19:55	AMANDA REEVES, CHAD LEWIS JR	TARGET	\$599.98	
8/12/2019	20:50	AMANDA REEVES, CHAD LEWIS JR	TARGET	\$449.97	
8/21/2019	20:43	AMANDA REEVES	TARGET		\$93.95
9/7/2019	12:31	CHAD LEWIS	TARGET	\$299.98	
10/26/2019	17:48	AMANDA REEVES, CHAD LEWIS JR	TARGET	\$1,195.88	
10/28/2019	16:00	AMANDA REEVES	TARGET		\$179.99
10/28/2019	19:30	AMANDA REEVES	TARGET	\$1,964.88	
11/3/2019	20:45	AMANDA REEVES	TARGET	\$746.99	

12/14/2019	17:00	AMANDA REEVES	TARGET		\$327.96
1/18/2020	16:52	AMANDA REEVES, CHAD LEWIS JR	TARGET	\$1,504.45	
1/27/2020	21:04	AMANDA REEVES, CHAD LEWIS JR	TARGET	\$1,301.95	
1/31/2020	20:46	AMANDA REEVES, CHAD LEWIS JR	TARGET	\$1,341.40	
3/10/2020	22:41	AMANDA REEVES, CHAD LEWIS JR	TARGET	\$515.97	
8/18/2021	14:21	AMANDA REEVES	TARGET		\$279.44
10/1/2021	17:05	AMANDA REEVES, CHAD LEWIS JR	TARGET	\$379.99	
10/24/2021	14:30	AMANDA REEVES, CHAD LEWIS JR	TARGET	\$1,049.95	
12/9/2021	16:00	AMANDA REEVES	TARGET		\$387.98
2/2/2022	11:17	SHABON BANKS	TARGET		\$410.76
11/11/2022	1804	AMANDA REEVES, CHAD LEWIS JR	LOWES	\$344.94	
11/25/2022	12:27	SHABON BANKS	TARGET	\$884.97	
12/7/2022	21:31	SHABON BANKS	TARGET	\$753.96	
12/10/2022	20:06	SHABON BANKS	TARGET		\$1,348.60
12/17/2022	16:07	SHABON BANKS	TARGET		\$581.93
1/9/2023	20:01	SHABON BANKS	TARGET	\$1,208.01	
1/21/2023	16:16	SHABON BANKS	TARGET	\$467.96	
1/22/2023	14:11	SHABON BANKS	TARGET	\$721.48	
2/4/2023	21:36	SHABON BANKS	TARGET	\$824.90	
2/10/2023	18:33	SHABON BANKS	TARGET	\$1,470.30	
2/12/2023	1430	AMANDA REEVES, CHAD LEWIS JR	LOWES	\$310.98	
2/13/2023	13:21	SHABON BANKS	TARGET		\$651.95
2/17/2023	9:11	SHABON BANKS	TARGET	\$332.95	
2/24/2023	17:02	SHABON BANKS	TARGET		\$586.98
2/26/2023	17:19	SHABON BANKS	TARGET	\$567.03	
3/4/2023	21:54	SHABON BANKS	TARGET	\$1,019.89	
3/9/2023	19:00	SHABON BANKS	TARGET	\$870.31	
3/23/2023	1713	SHABON BANKS	LOWES	\$449.94	
4/2/2023	3:51	SHABON BANKS	TARGET	\$541.21	
4/8/2023	20:55	SHABON BANKS	TARGET	\$320.38	
4/13/2023	16:39	SHABON BANKS	TARGET	\$22.00	
4/15/2023	3:49	SHABON BANKS	TARGET		\$2,050.70
4/16/2023	1:54	SHABON BANKS	TARGET	\$1,162.84	
4/17/2023	20:05	SHABON BANKS	TARGET	\$995.88	
6/9/2023	1113	AMANDA REEVES, CHAD LEWIS JR	LOWES	\$451.97	

10/14/2023	1728	SHABON BANKS	LOWES	\$813.76	
10/27/2023	1811	SHABON BANKS	LOWES	\$895.86	
10/27/2023	1811	SHABON BANKS	LOWES	\$746.72	
11/1/2023	16:45	SHABON BANKS	TARGET		\$248.00
11/12/2023	14:33	SHABON BANKS	TARGET		\$1,357.88
11/14/2023	21:53	SHABON BANKS	TARGET		\$287.92
11/14/2023	9:53	SHABON BANKS	TARGET	\$329.99	
11/22/2023	22:05	SHABON BANKS	TARGET	\$287.66	
11/25/2023	1604	SHABON BANKS	HOME DEPOT	\$764.92	
12/1/2023	1828	SHABON BANKS	LOWES	\$693.78	
12/1/2023	1828	SHABON BANKS	LOWES	\$1,398.43	
12/5/2023	2012	SHABON BANKS	LOWES	\$537.94	
12/5/2023	2012	SHABON BANKS	LOWES	\$944.97	
12/7/2023	1935	SHABON BANKS, AMANDA REEVES, CHAD LEWIS JR	LOWES	\$2,663.02	
12/7/2023	1830	SHABON BANKS, AMANDA REEVES, CHAD LEWIS JR	LOWES	\$783.84	
12/8/2023	1655	SHABON BANKS	LOWES	UNKNOWN AMT	
12/9/2023	1627	SHABON BANKS	HOME DEPOT	\$556.99	
12/9/2023	19:15	SHABON BANKS	TARGET		\$229.98
12/11/2023	22:02	SHABON BANKS	TARGET	\$1,334.86	
12/11/2023	1854	SHABON BANKS	LOWES	\$139.90	
12/16/2023	11:02	SHABON BANKS	TARGET	\$522.75	
12/18/2023	1548	SHABON BANKS	LOWES	\$1,332.47	
12/20/2023	18:34	SHABON BANKS	TARGET		\$314.48
12/21/2023	23:38	SHABON BANKS	TARGET		\$1,001.68
12/24/2023	15:09	SHABON BANKS	TARGET	\$463.50	
12/28/2023	10:20	SHABON BANKS	HOME DEPOT		\$682.83
1/4/2024	1852	SHABON BANKS	LOWES	\$429.91	
1/5/2024	1504	SHABON BANKS	KOHLS	\$680.96	
1/6/2024	14:13	SHABON BANKS	HOME DEPOT		\$1,604.09
1/9/2024	9:48	SHABON BANKS	TARGET	\$199.00	
1/13/2024	1624	SHABON BANKS, AMANDA REEVES, CHAD LEWIS JR	HOME DEPOT	\$785.91	
1/18/2024	17:17	SHABON BANKS	TARGET		\$380.96
1/22/2024	1830	SHABON BANKS	LOWES	\$715.88	
2/3/2024	1508	SHABON BANKS	HOME DEPOT	\$479.92	
2/8/2024	1738	SHABON BANKS	LOWES	\$927.94	
2/14/2024	1717	SHABON BANKS	HOME DEPOT	\$419.82	
2/16/2024		SHABON BANKS	HOME DEPOT	\$660.83	
2/16/2024	1509	SHABON BANKS	HOME DEPOT	\$677.72	

2/22/2024	2034	SHABON BANKS	WALMART	\$1,011.80	
2/26/2024	UNKNOWN	SHABON BANKS	HOME DEPOT	\$139.94	
3/10/2024	2041	SHABON BANKS	WALMART	\$17.94	
3/12/2024	17:20	SHABON BANKS	TARGET	\$368.90	
3/21/2024	1625	SHABON BANKS	WALMART		\$97.94
		SHABON BANKS, AMANDA REEVES, CHAD LEWIS JR	HOME DEPOT	\$1,061.13	
3/28/2024	UNKNOWN	CHAD LEWIS JR	HOME DEPOT	\$1,518.79	
3/31/2024	2110	SHABON BANKS	WALMART		\$915.06
4/4/2024	18:22	SHABON BANKS	TARGET		\$1,131.72
4/4/2024	1154	CHAD LEWIS JR	HOME DEPOT	\$69.97	
		SHABON BANKS, AMANDA REEVES	HOME DEPOT	\$528.15	
4/17/2024	1614	SHABON BANKS	HOME DEPOT	\$200.58	
		SHABON BANKS, AMANDA REEVES	HOME DEPOT	\$127.48	
4/26/2024	2100	SHABON BANKS	HOME DEPOT	\$139.94	
4/28/2024	1226	AMANDA REEVES	HOME DEPOT	\$330.79	
4/30/2024	2033	SHABON BANKS	HOME DEPOT	\$339.82	
5/15/2024	1113	SHABON BANKS	HOME DEPOT	\$1,416.88	
5/22/2024	1953	SHABON BANKS	HOME DEPOT	\$359.00	
5/27/2024	2019	SHABON BANKS	HOME DEPOT	\$578.00	
5/30/2024	1854	SHABON BANKS	HOME DEPOT	\$1,524.00	
6/5/2024	2010	SHABON BANKS	HOME DEPOT	\$747.00	
6/11/2024	2011	SHABON BANKS	HOME DEPOT	\$788.77	
6/15/2024	1837	SHABON BANKS	HOME DEPOT	\$2,159.82	
6/18/2024	1813	SHABON BANKS	HOME DEPOT	\$1,031.94	
6/21/2024	2022	SHABON BANKS	HOME DEPOT	\$452.96	
6/23/2024	1738	SHABON BANKS	HOME DEPOT	\$568.00	
6/29/2024	1739	SHABON BANKS	HOME DEPOT	\$381.94	
7/1/2024	1957	SHABON BANKS	HOME DEPOT	\$1,304.40	
		AMANDA REEVES, CHAD LEWIS JR	HOME DEPOT	\$1,005.94	
7/5/2024	1907	SHABON BANKS	HOME DEPOT	\$806.00	
7/6/2024	2020	SHABON BANKS	HOME DEPOT	\$825.98	
7/7/2024	1917	SHABON BANKS	HOME DEPOT	\$974.00	
7/10/2024	10:52	SHABON BANKS	HOME DEPOT	\$399.00	
7/10/2024	20:29	SHABON BANKS	HOME DEPOT	\$318.00	
		AMANDA REEVES, CHAD LEWIS JR	HOME DEPOT	\$268.96	\$271.83
8/5/2024	16:14	SHABON BANKS	HOME DEPOT	\$379.00	
8/16/2024	15:37	SHABON BANKS	HOME DEPOT	\$498.00	
8/21/2024	18:16	SHABON BANKS	HOME DEPOT	\$282.85	

8/22/2024	11:56	SHABON BANKS	HOME DEPOT	\$905.00	
8/29/2024	19:40	SHABON BANKS	HOME DEPOT	\$525.00	
8/30/2024	17:29	SHABON BANKS	HOME DEPOT	\$1,412.76	
8/31/2024	19:19	SHABON BANKS	HOME DEPOT	\$1,165.00	
9/1/2024	19:48	SHABON BANKS	HOME DEPOT	\$298.00	
9/7/2024	16:52	SHABON BANKS	HOME DEPOT	\$760.96	
9/14/2024	18:23	SHABON BANKS, AMANDA REEVES, CHAD LEWIS JR	HOME DEPOT	\$2,936.92	
9/17/2024	18:09	SHABON BANKS, AMANDA REEVES	HOME DEPOT	\$139.91	
9/18/2024	21:50	SHABON BANKS	HOME DEPOT	\$349.99	
9/19/2024	15:25	SHABON BANKS	HOME DEPOT	\$795.94	
9/21/2024	19:11	SHABON BANKS	HOME DEPOT	\$899.00	
9/21/2024	16:47	SHABON BANKS	HOME DEPOT	\$1,232.94	
9/24/2024	20:37	SHABON BANKS	HOME DEPOT	\$577.00	
9/27/2024	1814	SHABON BANKS, AMANDA REEVES	HOME DEPOT	\$2,013.58	
9/28/2024	1851	SHABON BANKS	HOME DEPOT	\$372.97	
TOTAL:				\$115,386.34	\$23,540.57

27. Records, physical surveillance, and surveillance camera footage obtained through this investigation show that BANKS regularly used the identity of her daughter, Santi STANLEY, to include STANLEY's driver's license, when selling stolen merchandise to NYGDP, in violation of 18 U.S.C. § 1028A. BANKS presumably did this to avoid detection by law enforcement. Banks is nearly 20 years older than STANLEY and physically distinguishable, however, as discussed below, NYGDP accepted Stanley's ID for all of BANKS' transactions.

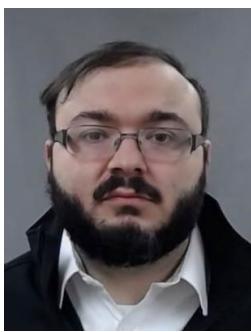
NEW YORK GOLD DIAMOND & PAWN

28. The LARCENISTS sold their stolen goods to NYGDP on a near-daily basis. NYGDP was incorporated in New York State as of January 11, 2018, with SPRAGUE as the CEO. According to licensing information filed with the Town of Greece, CIVILETTI has

been a manager and salesperson at NYGDP since at least 2021.¹ SPRAGUE and his wife (not named herein) also own and operate the related business, the Gold and Diamond Room (GDR), located at 508 Stone Rd., Rochester, NY, which is connected to NYGDP. CIVILETTI and SPRAGUE's relationship extends back several years. SPRAGUE and CIVILETTI conduct most of the daily operations of NYGDP.²

29. CIVILETTI, SPRAGUE, NYGDP, and the GDR are depicted below:

James Civiletti



Dominic Sprague



NYGDP & GDR



30. A large portion of SPRAGUE and CIVILETTI's business involves the resale of goods via eBay, Inc. ("eBay"), which is an online auction and shopping website through their eBay account "ampletools." Records obtained through this investigation have revealed that from January 1, 2022, through August 7, 2024, SPRAGUE and CIVILETTI generated approximately \$2,467,847.00 in revenue by re-selling approximately 48,191 new-in-box items on eBay. Because NYGDP, SPRAGUE, and CIVILETTI, purchased stolen, new-in-box

¹ According to records held by the Town of Greece, Sprague was the listed owner of NYGDP from 2018 until May 7, 2024, when he transferred ownership to his wife (J.S.), however, Sprague continues to run NYGDP's daily operations.

² Although not part of this investigation, SPRAGUE and CIVILETTI were convicted for their roles in a conspiracy involving illegal gambling in 2024. (See 23-CR-6107-EAW), for which both are serving a term of probation. SPRAGUE and CIVILETTI's involvement in the current scheme was not known to the federal government at the time of that prosecution.

merchandise as part of their normal course of business, there is probable cause to believe that a large portion of the new-in-box items sold by SPRAGUE and CIVILETTI were stolen.

31. EBay is headquartered in San Jose, CA and its servers are located in Utah and Nevada. Therefore, each of SPRAGUE and CIVILETTI's eBay sales caused the transmission of wire communications in interstate commerce in violation of 18 U.S.C. §§ 1343, 1349, and 371. After making such sales, SPRAGUE and CIVILETTI then shipped the stolen items to purchasers outside of New York State in violation of 18 U.S.C. §§ 2314 and 2315.

LEADSONLINE

32. Much of SPRAGUE and CIVILETTI's involvement with the LARCENISTS was discovered through records held by LeadsOnline. LeadsOnline is an electronic reporting system that NYGDP is required to use when purchasing merchandise from individuals. Because LeadsOnline's servers are located in Texas and Colorado, NYGDP, SPRAGUE and CIVILETTI's use of LeadsOnline caused additional wire transmissions in interstate commerce in furtherance of the conspiracy in violation of 18 U.S.C. §§ 1343, 1349, and 371.

33. NYGDP is required to comply with Town of Greece Code, Chapter 163A, which contains the local licensing rules for pawn shops and secondhand dealers in Greece. Section 163A-10 requires pawn shops and secondhand dealers to keep detailed records of any items they purchase, to include: "a detailed description of the item, including but not limited to identifying marks . . . or any other information appearing calculated to set apart the particular object purchased from others of like kind." Section 163A-10 further provides that: "[i]n lieu of the paper record, a computer-generated record or photograph reasonably depicting the items will be a suitable substitute for identifying the item . . . [t]he computer-

generated record or photograph shall contain the other information required above.” Section 163A-10 further requires that pawn shops obtain photo identification of the selling individual. This information is required to be uploaded to LeadsOnline daily, so that it can be accessed by law enforcement.

34. The purpose of these regulations is to enable law enforcement to identify stolen goods that have been sold to pawn shops, so that the goods can be recovered and returned to their rightful owners. The investigation has revealed that NYGDP, SPRAGUE, and CIVILETTI, routinely provided vague product descriptions, and low-quality photographs of large groups of items as part of their LeadsOnline purchase reports. This practice substantially impaired law enforcement’s ability to identify stolen items that NYGDP purchased and resold as part of its’ regular business, thus allowing NYGDP to continue to purchase and sell large volumes of stolen new-in-box items, undetected by law enforcement.

35. An example of a typical NYGDP LeadsOnline record, as compared to a legitimate record from another local pawn shop, is depicted below:³

³ These examples only contain the merchandise images and descriptions. The full pawn tickets also contain a photograph of the sellers’ identification, the date and time of the transaction, and the clerk involved in the transaction.

Example of legitimate purchase record by a local dealer

Item Listing					
Type	Make / Brand	Model	Serial No.	Details	Amount
1.) Other	HOME DECORATIONS	1006333912	NA	(Qty: 1) WHITE Condition: New In Box (NIB)	\$40.00
2.) Other	AIPER	SEAGULL 800B	S/N:21Y336W12200 1472	(Qty: 1) Condition: New In Box (NIB)	\$30.00
TOTAL: \$70.00					

Images




Reported as Item 1 Reported as Item 2
 Uploaded on 9/18/2024 (5:26 PM) Uploaded on 9/18/2024 (5:26 PM)

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ITEMS INDIVIDUALLY DESCRIBED WITH SERIAL OR MODEL NUMBERS

ITEMS ARE INDIVIDUALLY PHOTOGRAPHED SO THAT LAW ENFORCEMENT/RIGHTFUL OWNERS CAN IDENTIFY IF ITEMS ARE STOLEN

Purchase record by CIVILETTI for 12/30/23 purchase of stolen property from BANKS

Item Listing

Type	Make / Brand	Model	Serial No.	Details	Amount
1.) Other			NSN	(Qty: 1) X35 CADET, MILLWAKUEE, LUTRON, MEON, RING, EATON, RIDGID, EPOXYSHEILD, PHIIPLS Condition: NEW	\$575.00
TOTAL: \$575.00					

Images



NO SERIAL NUMBERS,
MODEL NUMBERS, OR
INDIVIDUAL IDENTIFYING
INFORMATION



PHOTOS DEPICT PILES OF NEW
IN BOX ITEMS WITHOUT ANY
INDIVIDUAL IDENTIFICATION

Purchase record by SPRAGUE for 1/9/24 purchase of stolen property from BANKS

NO SERIAL NUMBERS, MODEL
NUMBER, OR INDIVIDUAL
IDENTIFYING INFORMATION

Item Listing

Type	Make / Brand	Model	Serial No.	Details	Amount
1.) Other			NSN	(Qty: 1) X53 KIDDIE SMOKE, MY PASSPORT, SQUARE D, EATON BREAKERS, MILWAUKEE HEADLIGHTS, AIRTHINGS Condition: NEW	\$600.00
TOTAL: \$600.00					



Images



↑ Shown



PHOTOS DEPICT PILES OF NEW
IN BOX ITEMS WITHOUT AN
INDIVIDUAL IDENTIFICATION

36. NYGDP's purchase records were routinely misleading, because they obscured the items purchased through vague merchandise descriptions and photographs depicting piles of new-in-box items. Unlike the example of the legitimate LeadsOnline purchase record, which contains separate photographs for each item purchased, including serial and model numbers, NYGDP did not separate items or include any identifying information that could allow law enforcement, retailers, or others to identify the items as stolen. Instead, NYGDP routinely photographed piles of new-in-box items and described them in a manner that made it impossible for law enforcement or others to identify the items. Based on my training and experience, there is probable cause to believe that this practice was likely intended to impede law enforcement's ability to track stolen merchandise by making the merchandise difficult to identify. Because each LeadsOnline purchase record involved wire communications across state lines, the creation of the records constitutes violations of 18 U.S.C. §§ 1343; 1349; and 371.

37. The sheer volume of sales that BANKS (using Santi Stanley's identity), LEWIS, JR., and LEWIS made to NYGDP of new-in-box items is highly indicative of fraud. A review of LeadsOnline purchase records generated by NYGDP for sales by the LARCENISTS shows that between December 2021 and May 2024 alone, BANKS, LEWIS, JR., and LEWIS engaged in more than 670 individual sales of approximately 37,000 new-in-box items to NYGDP in exchange for more than \$290,000.00. This number has grown because NYGDP continues to regularly purchase stolen new-in-box merchandise from Chanc LEWIS.

38. Interviews of NYGDP employees, revealed that NYGDP only paid the LARCENISTS 30% of the value that an item was likely to generate via eBay sale.

Accordingly, the actual, retail value of the items that the LARCENISTS sold to NYGDP, SPRAGUE, and CIVILETTI, was likely between \$800,000 and \$1,000,000.

39. A summary chart demonstrating BANKS, LEWIS, JR., and LEWIS' sales to NYGDP through May 2024 is below.⁴

NAME	2024 (as of May)	2023	2022	2021	TOTAL
BANKS aka “Stanley”	\$28,107.00 55 Transactions	\$126,204.00 280 Transactions	\$75,816.00 199 Transactions	\$1,400.00 6 Transactions	\$231,527.00 540 Transactions
CHAD LEWIS, JR.	\$41,400.00 83 Transactions	\$4,877.00 25 Transactions			\$46,277.00 108 Transactions
CHANC LEWIS	\$12,475.00 28 Transactions				\$12,475.00 28 Transactions
TOTALS	\$81,982.00 166 Transactions	\$131,081.00 305 Transactions	\$75,816.00 199 Transactions	\$1,400.00 6 Transactions	\$290,279.00 676 Transactions

40. The purchases from BANKS and LEWIS, JR. far exceed NYGDP's purchases from any other individual – which is another strong indicator of fraud. Analysis of NYGDP's purchase records show that the next highest sales during an 18-month period to a single individual (other than for gold/jewelry), only totaled \$30,902.00 - \$200,000 less than NYGDP's purchases from BANKS, and approximately \$15,000 less than NYGDP's purchases from LEWIS, JR.

⁴ Chanc LEWIS continues to sell new-in-box merchandise, and as a result, these numbers have increased.

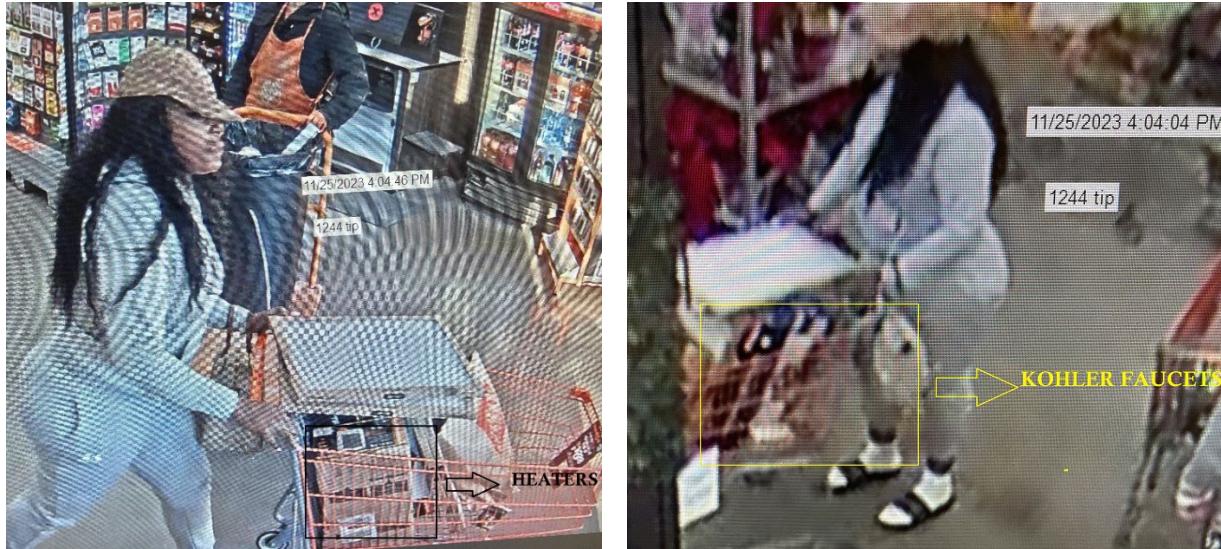
41. It should be noted that CHANC LEWIS continues to sell new-in-box merchandise to NYGDP on a regular basis, having made 9 additional sales at NYGDP in September and October 2024. As of October 8, 2024, CHANC LEWIS has engaged in a total of 37 sales to NYGDP for a total of \$14,845.00. It appears that CHANC LEWIS assumed the role of selling stolen merchandise for the LARCENISTS after the GPD confronted CIVILETTI in March 2024 after CHAD LEWIS, JR. sold CIVILETTI stolen merchandise (discussed below).

SPECIFIC EVIDENCE OF CONSPIRACY AND EXAMPLES OF OVERT ACTS

42. The following is a summary of select overt acts committed in furtherance of the conspiracy during the limited time-period of November 25, 2023, through April 17, 2024, and select evidence demonstrating the existence of the conspiracy. References to these acts are contained in the theft chart detailed above. This list is non-exhaustive and does not include every action known to law enforcement.

November 25, 2023

43. On November 25, 2023, at 4:04 pm, BANKS stole multiple Kohler Sous Pro faucets and 1500w heaters (among other items), from Home Depot in Greece. A screenshot of surveillance video from the incident is below:



44. Within 40 minutes of the theft, at 4:42 pm, BANKS sold the stolen merchandise to NYGDP for \$1,425 using Stanley's identity in violation of 18 U.S.C. § 1028A.

45. Consistent with NYGDP's practice of providing incomplete and obscure information on LeadsOnline, NYGDP created a LeadsOnline purchase record listing multiple new-in-box items, without specific product descriptions:

Item Listing					
Type	Make / Brand	Model	Serial No.	Details	Amount
1.) Other			NSN	(Qty: 1) EATON, LEVITON, SQUARE, SONY, BRK, CADET, HYPER, BOSCH, COBRA, INSTAX, AIRTHINGS, SAMSUNG, HOMELINE, ECOBEE Condition: NEW	\$1,425.00
					TOTAL: \$1,425.00

46. The photos accompanying the LeadsOnline purchase record are equally obscure, showing a pile of miscellaneous items. Nevertheless, the faucets and heaters that BANKS stole are visible:

Heaters



Faucets



47. EBay records show that on December 6, 2023, SPRAGUE and CIVILETTI posted for sale the stolen faucets and other new-in-box items purchased from BANKS. The items were ultimately sold to buyers in Texas, New Jersey and Oregon.

December 5, 2023

48. On December 5, 2023, at 8:12 pm, BANKS purchased an air filter from Lowes in Greece, which is a tactic that BANKS employs to conceal other merchandise in her cart that she wants to steal. BANKS then placed a Dewalt drill, 20v Dewalt sander, 1 diva smart-dimmer switch, (2) 15-amp circuit breakers, and 3 water filter packs under the air filter. BANKS then exited the store without paying. A screenshot depicting the incident is below.



49. On December 6, 2023, NYGDP purchased the items BANKS stole from Lowes (and multiple other stolen items, to include radon detectors stolen from Home Depot) for

\$740. NYGDP again created a LeadsOnline purchase record, which listed the purchase of 60 new-in-box items, without specific product descriptions, and contained photos of piles of goods, within which the Dewalt Drill, the circuit breakers, and the dimmer switch BANKS stole are visible:

Type	Make / Brand	Model	Serial No.	Details	Amount
1.) Other			NSN	(Qty: 1) 60X KOHLER, DELTA, ROCKSOLID, CASETA, LEVITON, DEWALT, RADON, ACSMITH, CADET, MASTERLOCK, MILWAUKEE, LOGITECH, MOEN, SQUARE D, LUTRON, ECOBEE, INTERMATIC, KIDDIE, GE FILTER Condition: NEW	\$740.00



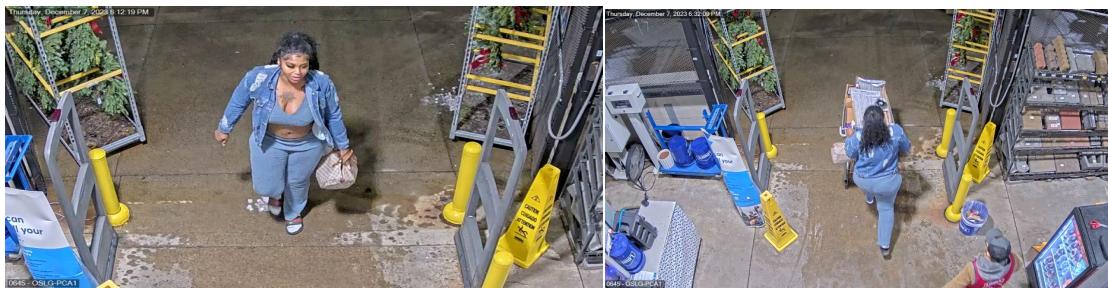
50. EBay records show that on December 17, 2023, SPRAGUE and CIVILETTI posted multiple new-in-box items for sale including multiple “1 Pack GE RPWFE Refrigerator Replacement Water Filter Brand New Sealed,” which were stolen from Lowes, and “(9) AIRTHINGS 2951 WAVE 2ND GENERATION RADON DETECTOR – WHITE,” which are believed to have been stolen from Home Depot. Many of these items were sold to buyers out of New York State to include in Washington, Florida, Michigan, Pennsylvania, Texas, Wisconsin, Ohio, Illinois, Tennessee and Kentucky.

December 7, 2023

51. On December 7, 2023, at 6:32 pm, BANKS, REEVES and LEWIS, JR. were recorded by surveillance video engaged in a coordinated retail theft at Lowes in Henrietta.

They were observed indiscriminately selecting various items including CO2/smoke detector packs and electric heaters. Surveillance video shows BANKS meet up with REEVES before REEVES exits the store and proceeds to her vehicle. Shortly thereafter, BANKS passes all points of sale with a cart full of merchandise, without rendering payment. After that, LEWIS, JR. exited with another cart of stolen merchandise. LEWIS, JR. met with REEVES in the parking lot, at which point BANKS and REEVES leave the location in separate vehicles. The estimated loss in this incident is \$2,663.02. Screenshots depicting this incident and the itemized list of items stolen are below.

Shabon BANKS:



Amanda REEVES:



Chad LEWIS, JR.



Merchandise stolen:

SKU Number		Model #	Quantity	Unit Price	Total Price
5473120-BRK	10-Year Battery 6-Pack Hardwired Ionization Sensor S	1046851	6	\$178.40	\$1,070.40
4097226-Express 4K+ 4K/HD/HDR Smart Streaming Device with Remote		3941R2	3	\$39.99	\$119.97
64538-Bronze Zone Valve for Hot Water Hydronic Baseboard Heate		A1047	3	\$141.00	\$423.00
259841-20-25 BASIC FLTR FILTRETE(-67837)		FBL03-CASE	3	\$5.97	\$17.91
2701730-120V 1500W FAN FORCED HTR		DCSC151TW	1	\$154.00	\$154.00
2701729-240V 4000W FANFORCED HTR(-797410)		DCSTC402TW	1	\$228.00	\$228.00
118503-Plastic Tub/Shower Cartridge Repair Kit		RP19804	2	\$65.98	\$131.96
5473117-BRK 10-Year Battery-operated Ionization Sensor Smoke Det		1046857	1	\$24.98	\$24.98
5473118-BRK 10-Year Battery 6-Pack Battery-operated Ionization S		1046859	2	\$127.40	\$254.80
1157130-V20 20-Volt 4 Ah; Lithium Ion (li-ion) Battery		CMCB204-OPE	2	\$119.00	\$238.00

52. Within 35 minutes of this theft, at 7:05 pm, NYGDP purchased 31 new-in-box items from BANKS (using Stanley's identity) for \$530.00.

53. On the next day, December 8, 2023, NYGDP completed three more purchases from BANKS and LEWIS, JR. as follows:

- a. At 1:32 pm, NYGDP purchased an unknown number of new-in-box items from LEWIS, JR. for \$120;



- b. At 7:05 pm, NYGDP purchased 12 new-in-box items from BANKS (using Stanley's identity) for \$270;



c. At 7:16 pm, NYGDP purchased 32 new-in-box items from LEWIS, JR. for \$285.



54. Several items purchased by NYGPD were confirmed to have been stolen from Lowes during the December 7, 2023, incident. EBay records show that SPRAGUE and CIVILETTI sold the items to purchasers in Pennsylvania, Georgia, Ohio, Michigan, New Jersey, Illinois, and Florida.

December 18, 2023

55. On December 18, 2023, at 3:48 pm, surveillance video captured BANKS stealing multiple items from Lowes in Greece, including: (4) 6pack hardwired combination smoke and carbon monoxide detectors; (4) path lights with remotes; (2) 4 pack solar pathway lights; and (1) 3 count 20-25 basic filters. The total value of the items is \$1,332.47. A screenshot of the incident is below.



56. Within 3 hours of the theft, at 7:07 pm, NYGDP purchased 53 new-in-box items from BANKS (under Stanley's name) for \$635.00. NYGDP again created a LeadsOnline purchase record, which listed the purchase of 53 new-in-box items, without specific product descriptions, and contained photos of piles of merchandise. Some of the items purchased from BANKS match the items that BANKS stole from Lowes earlier that day.

Item Listing					
Type	Make / Brand	Model	Serial No.	Details	Amount
1.) Other			NSN	(Qty: 1) 53X COMPAK, BRK ALERT, PETSAFE, RADON, NATRUAL GAS ALERT, INTERMATIC, AO SMITH, MILWAUKEE, LEVITON, SQUARE D, LOGITECH, PHILLIPS , WYZE, LIDDLE SPEAKER, KIDDIE, GOVEE, RYOBI, DEWALT Condition: NEW	\$635.00
TOTAL: \$635.00					



57. EBay records show that on January 3, 2024, SPRAGUE and CIVILETTI posted “(3) First Alert BRK SC9120B6CP 120V AC/DC Carbon Monoxide Smoke Alarm, White 6 Pack” and “(1) GE Reverse Osmosis Replacement Filter Set FQ18PN (Filter Replacement – L)” for sale, which is what BANKS stole during the December 18, 2023, larceny at Lowes. SPRAGUE and CIVILETTI also posted “(1) PetSafe PIG00-10777 Stubborn Dog System In-Ground Radio Fence sealed,” which they also purchased from BANKS on December 18, 2023. EBay records show that at least three of these items were sold to buyers outside of New York State, to include in Illinois, California, and Florida.

January 5, 2024

58. On January 5, 2024, GPD conducted physical surveillance on BANKS vehicle (a Volkswagen Jetta), which was observed in the parking lot at the Greece Home Depot with

BANKS as the sole occupant. BANKS was observed leaving the Home Depot parking lot and traveling to Lowes in Greece. BANKS entered Lowes and was observed exiting a short time thereafter with a furnace filter. As described above, BANKS uses furnace filters that she purchases as a means of concealing items that she intends to steal. BANKS then traveled to Kohl's in Greece and entered the store. BANKS was observed walking out of Kohl's a short time later with a large tote. Asset Protection for Kohl's, reviewed video surveillance and observed BANKS select various clothing items, place them in the tote, and exit the store without payment, for a total loss of \$680.96. A photo of BANKS leaving Kohl's with the tote is below.



59. BANKS then drove to NYGDP and entered the store with the tote:



60. According to a purchase report filed by NYGDP on LeadsOnline, at 3:38 pm, NYGDP purchased 30 new-in-box items from BANKS, under Stanley's name, for \$370. Notably, GPD did not observe anyone other than BANKS enter the store during this transaction, confirming that BANKS had been the person using Stanley's identification (and driver's license) in connection with the scheme in violation of 18 U.S.C. § 1028A. The items NYGDP purchased on this date are depicted below.



61. Less than 4 hours later, at 7:13 pm, NYGDP purchased 56 additional new-in-box items from BANKS, under Stanley's name, for \$610. These items are depicted below.



February 14, 2024

62. On February 14, 2024, at 5:17 pm, BANKS was observed stealing (6) Milwaukee 600 lumen hardhat headlamps from Home Depot in Greece. Below is a screenshot of surveillance footage of the theft:



63. At 6:30 pm that same day, NYGDP purchased 63 new-in-box items from BANKS for \$500, using Stanley's identity, which NYGDP listed as follows:

Type	Make / Brand	Model	Serial No.	Details	Amo
1.) Other		NSN		(Qty: 1) 63X RIDGID, KIDDIE, GE FILTERS, MAKITA, LEVITON, SQUARE D, FIXIT Condition: NEW	\$500
TOTAL: \$500					

64. Notably, the description of items prepared by NYGDP did not reference any Milwaukee items, however, the items pictured in LeadsOnline for the transaction show multiple Milwaukee tools including drill bits, screw drivers, smoke/carbon monoxide detectors, and at least (5) Milwaukee headlamps that were confirmed to be stolen from Home Depot. This is another example of NYGDP's misleading practices when creating LeadsOnline purchase records.



65. By February 14, 2024, GPD had installed a covert camera near the exterior of NYGDP to surveil store traffic. A review of video from that date shows BANKS exit her vehicle and walk into the pawn shop with merchandise, consistent with the purchase report above. A short time later, BANKS exits the store and leaves the area. At no point did anyone else enter the pawn shop with BANKS, confirming that BANKS conducted the transaction using Stanley's identity in violation of 18 U.S.C. § 1028A.

February 16, 2024

66. On February 16, 2024, GPD physically surveilled BANKS at the Irondequoit Home Depot. GPD saw BANKS exit the store with a small green box. GPD contacted Asset Protection from Home Depot, who confirmed that BANKS was captured on surveillance stealing multiple items for a total loss of \$660.83. BANKS left the store at approximately 12:53pm. A screenshot of BANKS leaving the store with the green box is below.



67. At approximately 2:30 pm, the covert camera recorded BANKS entering NYGDP carrying the green box that she stole from Home Depot. According to a NYGDP LeadsOnline purchase record, NYGDP purchased 43 new-in-box items from BANKS, including the spa panel/breaker in the green box that BANKS stole that day.



68. By this point in the investigation, GPD obtained GPS information for BANKS' vehicle via search warrant. GPS information showed that after selling the stolen items to NYGDP, BANKS drove directly to the Home Depot in Greece, where she arrived at approximately 2:45 pm. Asset Protection from Home Depot in Greece reported BANKS stole various items totaling \$677.72, from that location.

69. GPS data then showed BANKS return to NYGDP for a second time on February 16, 2024, at which point she sold approximately 80 new-in-box items, including items that she stole from the Greece Home Depot that day.



February 17 through February 21, 2024

70. BANKS made additional sales to NYGDP on February 17, 2024, in which she sold 38 new-in-box items for \$350.00; February 18, 2024, in which she sold 35 new-in-box items for \$545.00 (this sale was personally conducted by SPRAGUE); and February 19, 2024, in which she sold 49 new-in-box items for \$450.00.

71. On February 20, 2024, GPD responded to NYGDP where they spoke with SPRAGUE concerning the spa panel/breaker in the green box that BANKS stole from Home Depot on February 16, 2024. During the conversations, investigators advised SPRAGUE that the item was stolen and that police would have to confiscate it. CIVILETTI was present in the store speaking with two other customers at this time. When investigators showed SPRAGUE the LeadsOnline purchase report for the item, SPRAGUE had the following exchange with investigators:

SPRAGUE: "You're finally getting them . . . finally . . . Jesus, I've been waiting."

INVESTIGATOR: "Who?"

SPRAGUE: "That person there" [pointing to Stanley's photograph on the purchase report]

INVESTIGATOR: "What's her name? Santi Stanley?"

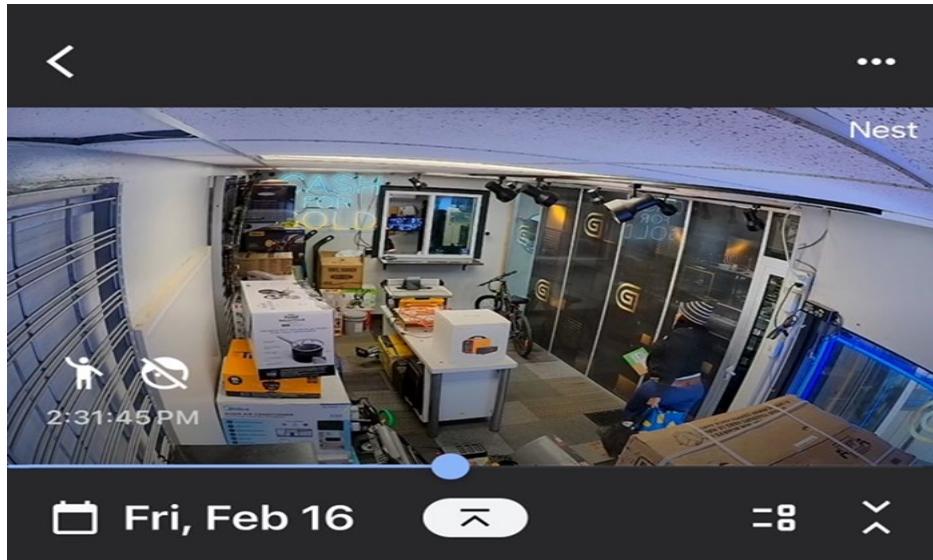
72. SPRAGUE then indicated that Stanley (now identified as BANKS), had been coming to NYGDP for "a long time" and indicated that he has watched her "come and go, come and go." At one point SPRAGUE commented "holy shit, she brings a lot" when talking about the volume of merchandise BANKS brings into his store. SPRAGUE also indicated that CIVILETTI hated BANKS. When the investigator asked whether Stanley (BANKS) "brings a lot to you?" SPRAGUE responded: "look her up – that's your answer." SPRAGUE said Stanley (BANKS) had "been going for a long time" and he "can't believe it," and referred to Stanley as a "frequent flyer." SPRAGUE then told investigators that when something like this happens, he won't buy from a customer anymore, indicating that he would no longer purchase items from Stanley (BANKS).

73. On February 21, 2024, GPD spoke with the employee, N.S., who purchased the spa panel/breaker in the green box from BANKS on February 16. In sum and substance, N.S. stated that a female with the identification of "Stanley" often comes to the pawn shop in order to sell items. N.S. explained that NYGDP pays customers 30% of the value that NYGDP would be likely to sell the item for on eBay. SPRAGUE was present during the interview and offered that Stanley (BANKS) "comes in often." When asked to describe Stanley, N.S. said that she was "in her early 40's" at which point SPRAGUE offered that she was "in her early 30's" (BANKS is in fact 41). SPRAGUE then commented that Stanley's ID indicates that she is "22" (Stanley was in fact 22 at that time), to which N.S. replied "no way."

74. SPRAGUE provided investigators still photographs from surveillance video of the February 16, 2024, transaction, showing that BANKS actually made the transaction in

Stanley's name. The surveillance photo shows that BANKS wore the same clothes and hat to NYGDP that she wore when she stole the items from Home Depot on February 16, 2024.

NYGDP Surveillance photo from 2/16/24



Home Depot photo showing 2/16/24 theft:



75. LeadsOnline records show that BANKS' last transaction at NYGDP (in Stanley's name) occurred on February 19, 2024. It was at that point that Chad LEWIS, JR.'s sales to NYGDP increased to an almost daily basis.

February 20, 2024

76. On February 20, 2024, the covert camera recorded BANKS, LEWIS, JR. and REEVES arriving to NYGDP. LEWIS, JR. joined BANKS, took a tote from BANKS' vehicle, and approached the front door of NYGDP. According to a LeadsOnline purchase report, NYGDP purchased 55 new-in-box items from LEWIS, JR. at that time for \$390.00.

**February 22, 2024**

77. On February 22, 2024, GPD conducted physical surveillance on BANKS vehicle, in which BANKS was the sole occupant. GPD followed BANKS to the Home Depot located at 4139 Transit Rd. in Williamsville, NY, where it is believed that BANKS committed or attempted to commit a larceny. At 6:35 pm BANKS was observed traveling on Stone Rd. in the Town of Greece, with REEVES' vehicle following behind. Both vehicles parked at the Dollar General located on Dewey Ave. in the City of Rochester. LEWIS, JR. was then observed exiting the back seat of the REEVES' vehicle, retrieving property from BANKS, and returning back to REEVES' vehicle. REEVES and LEWIS, JR. then drove to NYGDP, where at 6:50 pm, LEWIS, JR. sold 60 new-in-box items directly to SPRAGUE for \$530.00. The items, which are depicted below, are commonly sold at Home Depot, where BANKS was observed hours earlier. Consistent with the practice of NYGDP, SPRAGUE included vague identifying information in the LeadsOnline purchase report that he submitted.



Type	Make / Brand	Model	Serial No.	Details	Amount
1.) Other			NSN	(Qty: 1) 60-FISKERS, MILWAUKEE, LEVITON, OATEY, DELTA, LUTRON, MOEN Condition: NEW	\$530.00

78. Following the sale to SPRAGUE, REEVES and LEWIS, JR. drove back to the Dollar General, where they met BANKS. LEWIS, JR. walked to BANKS' vehicle where it appeared that they had some type of exchange, before returning to REEVES' vehicle, at which point REEVES and LEWIS, JR. left.

February 26, 2024

79. On February 26, 2024, Asset Protection personnel from Home Depot in Greece informed GPD that BANKS had stolen (2) 600 lumen Milwaukee hardhat headlamps. GPD responded but were unable to locate BANKS vehicle at the store.



80. GPD then observed REEVES in her vehicle a short distance from the Home Depot where the larceny had taken place. Covert camera surveillance video from NYGDP revealed that later that day, REEVES and LEWIS, JR. drove to NYGDP, where LEWIS, JR. entered the store carrying items. A short time later, LEWIS, JR. exited NYGDP empty handed.

81. According to a purchase record filed on LeadsOnline, CIVILETTI purchased 118 new-in-box items from LEWIS, JR. for \$1,180.00. CIVILETTI's purchase report, which is devoid of particular identifying information, and a photo of the items are below.

Type	Make / Brand	Model	Serial No.	Details	Amount
1.) Other			NSN	(Qty: 1) X118 KIDDIE DECTOR, DELTA PARTS, MILWAUKEE LIGHTS, MILWAUKEE BITS, MAKITA BITS, SQUARE D, EATON BREAKERS, MALCO GRIPS, RING BATTERIS PRO Condition: NEW	\$1,180.00



82. On March 14, 2024, CIVILETTI posted multiple items for sale on eBay, to include headlamps matching those stolen by BANKS from Home Depot. eBay records show that fourteen of these items were sold to buyers outside of New York State.

March 1, 2024

83. On March 1, 2024, LEWIS, JR. sold 142 new-in-box items at NYGDP in two transactions that took place minutes apart for a total of \$1,425.00.

84. A review of covert camera surveillance footage showed that both BANKS and REEVES were present at NYGDP and all three interacted before and after the sales by LEWIS, JR.

March 11, 2024

85. On March 11, 2024, GPD conducted physical surveillance, and observed BANKS, REEVES, and LEWIS, JR. together outside of NYGDP. LEWIS, JR. entered the shop while REEVES remained in her Dodge Durango, and BANKS remained in a Jeep Cherokee that she was operating. LEWIS, JR. was observed interacting with both BANKS and REEVES after exiting the shop in a possible exchange. REEVES then left the parking lot at which point GPD initiated a traffic stop. REEVES fled, and her vehicle was later observed on a tow truck in the area of Holmes Rd. in the Town of Greece. BANKS' Jeep Cherokee was also observed on the side of the road in the area.

86. GPD followed REEVES vehicle to the tow company. GPS information for both vehicles indicated that REEVES Durango and BANKS Jeep were together, at the tow company at 9:45 pm. Based on the investigation of this case and my training and experience, I believe that REEVES likely abandoned the vehicle in order to avoid being apprehended by police during this incident.

March 23, 2024

87. On March 23, 2024, at 4:38 pm, NYGDP purchased 94 new-in-box items from LEWIS, JR. for \$630.00. Immediately following this sale, BANKS, REEVES, and LEWIS, JR. met at Home Depot in Greece. All three were observed communicating in the parking lot before entering the store. BANKS and LEWIS, JR. were observed stealing multiple items,

after which point all three left the store separately without paying for the items. BANKS placed her stolen merchandise in her vehicle, while LEWIS, JR. appeared to place his stolen merchandise in REEVES vehicle, where REEVES was waiting. BANKS then changed clothes in her vehicle, and reentered the store at which point, she appeared to have attempted a second larceny. LEWIS, JR. also reentered the store and committed an additional larceny, after which he was observed entering REEVES vehicle before driving away. The total known loss for this incident is \$1,061.13.

Banks entry #1 Banks entry #2 Lewis, Jr. #1 Lewis, Jr. #2 Reeves



88. On the next day, March 24, 2024, NYGDP purchased multiple new-in-box items from LEWIS, JR. for \$505.00. The items included a Milwaukee blade kit, (2) 60-amp panel boxes, and (1) 50-amp panel box.



89. EBay records show that SPRAGUE and CIVILETTI sold some of these items to buyers outside of New York State to include in Wisconsin, Utah, and Oregon.

March 28, 2024

90. On March 28, 2024, GPD responded to NYGDP concerning items purchased from the LARCENISTS. GPD spoke with an employee of NYGDP, N.P., as well as CIVILETTI. GPD explained that a Milwaukee blade kit that LEWIS, JR. sold to NYGDP was stolen from Home Depot and would be confiscated.

91. During the conversation, CIVILETTI acknowledged knowing LEWIS, JR., who he referred to as a “frequent flyer.” CIVILETTI confirmed that LEWIS, JR. brought items in using a tote, and he and N.P confirmed that LEWIS, JR. frequently sold items to NYGDP. At one point, CIVILETTI, while explaining that individuals could possibly get new-in-box merchandise to sell to NYGDP by buying pallets, acknowledged that there was “a risk of buying” such property, because it could be stolen.

92. Despite being specifically advised that LEWIS, JR. had sold NYGDP stolen property, NYGDP purchased further property from LEWIS, JR. on April 6, 2024, which included 67 new-in-box items for \$455.00. These items included the same type of Milwaukee blade kits that LEWIS, JR. had previously sold, and which were confirmed to be stolen.



93. On April 7, 2024, SPRAGUE and CIVILETTI’s eBay account listed the remaining two stolen Milwaukee blade kits for sale that LEWIS, JR. sold to NYGDP on

March 24, 2024. This was possible, because NYGDP returned only one of the three stolen blade kits to law enforcement once they were notified LEWIS sold stolen merchandise. On April 8, 2024, and May 1, 2024, SPRAGUE and CIVILETTI's sold additional merchandise via eBay, which matched the items stolen by the LARECENISTS. Many of the stolen items were then shipped to buyers outside of New York State.

April 2, 2024

94. On April 2, 2024, GPD observed a Honda Accord, registered to REEVES and titled to CHAD LEWIS, JR. The vehicle had tinted windows, incorrect license plates, and was uninsured. A traffic stop was initiated at which point CHANC LEWIS was identified as the sole occupant and operator. LEWIS explained that the vehicle belonged to CHAD LEWIS, JR., who she described as her cousin. The vehicle was searched incident to tow, at which point Officers viewed multiple new in box tools that were stolen from Home Depot inside the vehicle. The total value of the stolen items was over \$2,000.

95. Chanc LEWIS was unable to provide a receipt for the items, and at no point did Chanc LEWIS or CHAD LEWIS, JR. claim ownership of the items, which were seized by GPD. A photograph of the items is below:



April 7 and 8, 2024

96. Following Chad LEWIS, JR.'s final transaction at NYGDP on April 6, 2024, CHANC LEWIS began executing all sales of stolen property at NYGDP in furtherance of the conspiracy.

97. For example, on April 7, 2024, Chanc LEWIS sold 65 new-in- box items to NYGDP for \$1,335.00. eBay records show that SPRAGUE and CIVILETTI sold 7 of these items to buyers outside of New York State to include in Texas, Illinois, Washington, Tennessee, California, Virginia, and Florida.

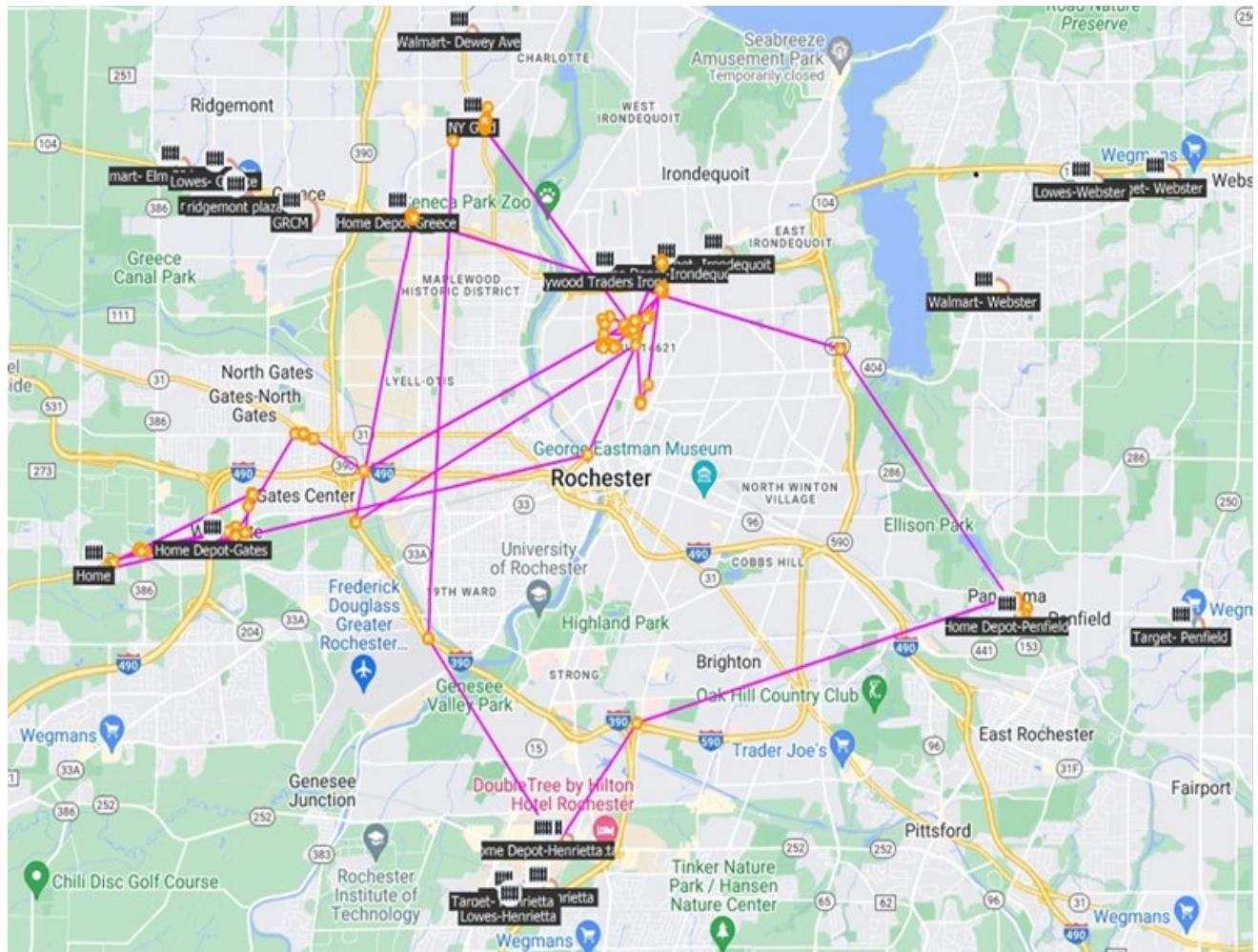
98. On April 8, 2024, CHANC LEWIS sold 64 new-in-box items to NYGDP for \$335.00. According to eBay records SPRAGUE and CIVILETTI sold 10 of these items to buyers outside of New York State to include in Florida, Montana, Alabama, Hawaii, and Massachusetts.

99. As of October 8, 2024, Chanc LEWIS has sold piles of new-in-box items on 37 separate occasions to NYGDP, for a total of \$14,845.00.

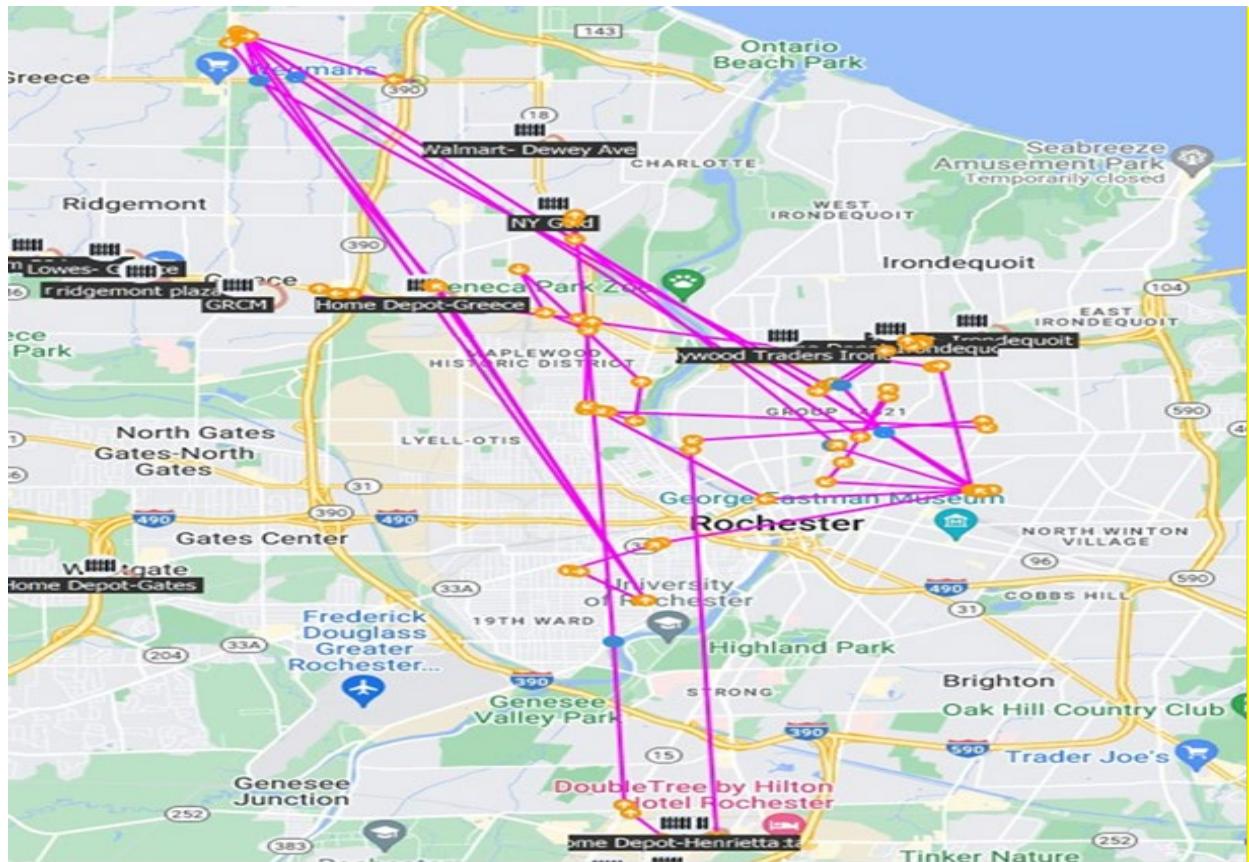
GPS Mapping

100. GPS data was collected for BANKS and REEVES' vehicles during the course of this investigation. The data shows BANKS and REEVES travel to multiple retailers on a daily basis, after which they consistently travel directly to NYGDP.

101. The map below shows BANKS' travel on April 16, 2024, demonstrating her travel to multiple retailers, after which she stops at NYGDP. The investigation has revealed that this is a typical pattern for both REEVES and BANKS.



102. The map below shows REEVES' travel on April 16, 2024, showing similar travel patterns to multiple retail stores and NYGDP at the same time as BANKS.



POLICE CONTACTS WITH SPRAGUE & CIVILETTI CONCERNING STOLEN PROPERTY

103. As indicated above, GPD advised SPRAGUE and CIVILETTI on February 20, 2024, February 21, 2024, and March 28, 2024, that NYGDP had purchased stolen property from the LARCENISTS.

104. GPD also spoke with CIVILETTI on April 14, 2024, at NYGDP for an unrelated matter, in which CIVILETTI purchased a pair of binoculars that were stolen as part of a burglary. When asked about the purchase, CIVILETTI told GPD that he only paid \$10

for the binoculars. CIVILETTI explained that he saw on the GPD website that the seller was wanted by GPD and so he made “a shitty offer just in case it came up stolen” – a demonstration of CIVILETTI’s willingness to purchase potentially stolen property, so long as the price was not too high. The seller in fact was wanted by GPD for a burglary at the time of the sale and was pictured on the GPD public website. CIVILETTI then proceeded to show GPD the posting that he observed about the seller on GPD’s website. When asked if he suspected the item was stolen, CIVILETTI said “not really . . . because it was used.” CIVILETTI then said: “if it was new I would have turned him away . . . pretty self-explanatory.” When asked whether a new item would have been more suspicious, CIVILETTI commented that if he sees a person on the GPD website, he would turn them away because its “self-explanatory” and “99% certain that it’s stolen.”⁵

105. Although NYGDP discontinued purchasing items from a particular LARCENIST when specifically advised that an item was stolen, SPRAGUE and CIVILETTI continued to purchase new-in-box items in large quantities on a daily basis, in complete disregard of the probability that such items were stolen.

106. A review of available police reports reveals that CIVILETTI was approached by police for purchasing stolen property at pawn shops on at least 12 different occasions between 2016 and 2024, to include the GPD contacts described above.

⁵ CIVILETTI referenced that NYGDP requires sellers to sign a disclaimer indicating that property is not stolen, before selling items to NYGDP. That formality is eclipsed by the evidence described herein, which demonstrates an overwhelming practice of purchasing obviously stolen new-in-box goods from larcenists.

107. Between 2011 and 2024, SPRAGUE was contacted by law enforcement on at least 20 different occasions regarding stolen property that either he, or a pawn shop that he operated, had purchased. On at least 4 different dates, SPRAGUE had been warned that he was violating local codes by failing to list serial numbers on LeadsOnline records, failing to record purchases on LeadsOnline, accepting improper from ID customers, and selling items before the mandatory hold periods had expired.

108. The evidence described above demonstrates that SPRAGUE and CIVILETTI were well-aware of the fact that NYGDP was engaged in the business of buying and selling stolen property, which they continue to do in connection with Chanc LEWIS and others not named herein.

EBAY RECORDS

109. Subsequent to purchasing the stolen goods, as set forth above, SPRAGUE and CIVILETTI would list them (or cause them to be listed) for sale on eBay as “New” condition.

110. eBay, Inc. (“eBay”) is an online auction and shopping website that provides a forum to connect individual purchasers and buyers.

111. Prior to selling on eBay, a user must agree to abide by the “eBay User Agreement.” In the User Agreement, sellers represent to eBay that they will not “breach or circumvent any laws, third party rights or our systems, policies, or determinations of your account status” or provide eBay with “content that is false, inaccurate, misleading, deceptive, defamatory, libelous, illegal, inappropriate, harmful, or violates and/or infringes the rights of others.”

112. Sellers also represent to eBay that they will abide by eBay's Selling Practices Policy, Stolen Property Policy, and Prohibited and Restricted Items Policy, each of which prohibits the sale of stolen property on eBay.

113. According to eBay records, the following eBay account is used by SPRAGUE, CIVILETTI, and NYGDP to resell items purchased through the pawn shop:

eBay Username	Name on Account	Email/Address
ampletools	James Civiletti	jim@nygolddiamond.com 512 Stone Road, Rochester, NY 14616

114. Prior to activating and using this account, CIVILETTI represented that he would abide by eBay's User Agreement and Selling Practices Policy.

115. Subsequent to purchasing the stolen goods, as set forth above, SPRAGUE and CIVILETTI listed (or caused to be listed) hundreds of thousands of dollars of stolen goods for sale on eBay, contrary to the representations made above. The item conditions were listed as "New," and the items were priced below retail value.

116. Specifically, since January 1, 2022, through August 7, 2024, "ampletools" sold approximately 48,191 items listed as "New" condition. The items sold are similar to those that law enforcement have observed LARCENISTS bringing into NYGDP during the course of the investigation. In addition, many of the items listed for sale on eBay match the items listed or photographed in the LeadsOnline purchase records filed by NYGDP for BANKS (Stanley), LEWIS, and LEWIS, JR., as described above. During the course of the investigation, law enforcement has not identified any legitimate source

of new merchandise for NYGDP. Furthermore, the review of LeadsOnline transactions filed by NYGDP also shows other known larcenists selling items to NYGDP over the past several years.

117. Based on my training, experience, and knowledge of this investigation, there is probable cause to believe that the vast majority of the items NYGDP listed as “New” condition on eBay were stolen merchandise that NYGDP had purchased from the LARCENISTS named herein, and other known larcenists selling new-in-box items to NYGDP. Therefore, all funds derived from the sale of stolen items constitute the proceeds of wire fraud, and for items that were shipped out of New York, the proceeds of the interstate sale and transportation of stolen goods (*i.e.* SUA proceeds).

118. The analysis of eBay records shows that 99% of the items sold under eBay User ID ampleteools, between January 1, 2022, through on or about August 7, 2024, were items with the condition of “New” generating approximately \$2,467,847 in revenue. The following chart summarizes these sales:

	<u>TOTAL ITEMS SOLD</u>		<u>TOTAL “NEW” ITEMS SOLD</u>	
eBay Username	Number of Items Sold	Gross Sales	Number of Items Sold	Gross Sales
ampleteools	48,245	\$2,475,544.04	48,191	\$2,467,847.46

119. Furthermore, the analysis of eBay records shows between January 1, 2022, through on or about August 7, 2024, SPRAGUE and CIVILETTI sold and shipped

approximately 44,484 items with the condition of “New” totaling approximately \$2,284,001.58 to buyers outside of New York.

MONEY LAUNDERING

CANANDIAGUA NATIONAL BANK RECORD

120. During the course of this investigation, subpoenaed records relating to the following identified accounts were provided by Canandaigua National Bank (CNB):

Account Number	Account Type	Account Title	Signors	Primary Address	Account Period Status
1108266079	Joint Optimum Checking	Dominic Sprague, James Civiletti	Dominic Sprague, James Civiletti	148 W Hill Est, Rochester, NY 14626	1/13/2021 - 4/27/2022
1108892000	Basic Business Checking	SSQ of NY Corp	Dominic Sprague, James Civiletti	512 Stone Road, Rochester, NY 14616	4/12/2022 - present
1107643464	Basic Business Checking	SSQ of NY Corp	Dominic Sprague	512 Stone Road, Rochester, NY 14616	8/5/2019 - present
1107045460	Basic Business Checking	NYGD Pawn Inc.	Dominic Sprague	508 Stone Rd, Rochester, NY 14616	2/1/2018 - 1/17/2023
1109174704	Basic Business Checking	NYGD Pawn Inc	Dominic Sprague	512 Stone Road, Rochester, NY 14616	12/5/2022 - present

121. From on or about January 1, 2022, to on or about August 19, 2024, SUA proceeds from eBay User ID “ampletools,” as discussed above, were initially deposited to CNB account ending in 2000 and 6079 controlled by SPRAGUE and CIVILETTI as detailed below:

CNB Account Number Ending	Deposits From eBay Sales (SUA Proceeds)	Signors on Account	Name and Address on Account
	\$1,532,998.98 (total)	Dominic Sprague James Civiletti	SSQ of NY Corp. 512 Stone Rd, Rochester, NY 14616
6079	\$164,395.88 (total)	Dominic Sprague (President) James Civiletti (Signor)	Dominic Sprague, James Civiletti 148 W Hill Est, Rochester, NY 14626

122. The deposits from eBay User ID “ampletools” which constitute SUA proceeds, that is, wire fraud, in violation of 18 U.S.C. § 1343, and the transportation and sale of stolen goods, in violation of 18 U.S.C. §§ 2314 and 2315, were transferred between various bank accounts associated with both SPRAGUE and CIVILETTI, often times in excess of \$10,000, in violation of 18 USC § 1957 and §1956(h). In addition, some of these SUA funds were withdrawn in cash and used by SPRAGUE and CIVILETTI to purchase more stolen goods from LARCENISTS and other larcenists bringing items into NYGDP to list for sale on eBay, therefore perpetuating and promoting the SUAs, in violation of §1956(a)(l)(A)(i) and §1956(h). These transactions are discussed below.

CNB Account 6079

123. The analysis of CNB Records for account ending in 6079 show that the account was opened on or about December 30, 2020, and was titled in the name of DOMINIC SPRAGUE and JAMES CIVILETTI with a primary address of 148 W Hill Est, Rochester,

NY 14626. SPRAGUE and CIVILETTI are the listed signatories on CNB Account 6079. CNB Account 6079 was closed in April of 2022 when CNB Account 2000 was opened and began receiving eBay deposits.

124. During the time period of January 1, 2022, through April 27, 2022, CNB Account total deposits of approximately \$165,028.35 were made. Approximately \$164,395.88 of those deposits are traceable to sales from eBay account “ampletools.” As previously explained, the deposits from eBay account “ampletools” constitute proceeds of an SUA. Within days, all deposits from eBay were transferred from CNB 6079 to CNB account 3464 in the name of SSQ of NY Corp, for which SPRAGUE is the only signor.

CNB Account 2000

125. The analysis of records relating to CNB Account ending in 2000 show that the account was opened on or about April 12, 2022, in the name of SSQ of NY Corp with a primary address of 512 Stone Rd, Rochester, NY 14616. SPRAGUE and CIVILETTI are the listed signatories on CNB account 2000 with SPRAGUE listed as the President while CIVILETTI is listed as a signor.

126. During the time period of April 12, 2022, through August 19, 2024, CNB account ending in 2000 received total deposits of approximately \$1,535,987.49, of which approximately \$1,532,998.98 of those deposits are traceable to sales from eBay account “ampletools,” as shown above. Within days, all deposits from eBay were transferred to CNB account 3464 in the name of SSQ of NY Corp, which SPRAGUE for which SPRAGUE is the sole signor.

127. An analysis of the withdrawals from CNB Account 2000 for the time period April 12, 2022, through August 19, 2024, indicate that approximately \$1,534,560.00 was transferred to CNB Account 3464.

128. SPRAGUE and CIVILETTI used the money received from eBay sales from “ampletools,” which constitutes proceeds of an SUA, to conduct monetary transactions in excess of \$10,000 in violation of Title 18 U.S.C. § 1957, which are detailed in the following chart: (please note this chart represents only a sample of the violations of Title 18 U.S.C § 1957 violations related to this account and is not all inclusive).

Account Number	Date of Transaction	Amount of Transfer	Description
1108892000	11/22/2022	\$ 10,800.00	Eff. 11-21 Withdrawal Internet Transfer to XXXXXX3464 - eBay sales
1108892000	12/20/2022	\$ 12,800.00	Withdrawal Internet Transfer to XXXXXX3464 - eBay sales
1108892000	01/24/2023	\$ 17,800.00	Withdrawal Internet Transfer to XXXXXX3464 - eBay sales
1108892000	02/07/2023	\$ 15,000.00	Withdrawal Internet Transfer to XXXXXX3464 - eBay sales
1108892000	03/13/2023	\$ 10,800.00	Withdrawal Internet Transfer to XXXXXX3464 - eBay sales
1108892000	05/30/2023	\$ 12,600.00	Withdrawal Internet Transfer to XXXXXX3464 - eBay sales
1108892000	12/11/2023	\$ 10,200.00	Withdrawal Internet Transfer to XXXXXX3464 - eBay sales

CNB Account 3464

129. The analysis of records relating to CNB Account 3464 show that the account was opened on or about August 5, 2019, in the name of SSQ of NY Corp with a primary address of 512 Stone Rd, Rochester, NY 14616. SPRAGUE is listed as the President and only authorized signor of CNB account 3464.

130. During the time period of January 1, 2022, through August 19, 2024, CNB account 3464 received total deposits of approximately \$1,875,517.79, of which approximately \$1,700,750.66 of those deposits were transfers from CNB Account 6079 and 2000, which are traceable to sales from eBay account “ampletools,” as shown above.

131. An analysis of the withdrawals from CNB Account 3464 for the time period January 1, 2022, through August 19, 2024, indicate that approximately \$858,445.50 was transferred to CNB Account 4704 and approximately \$324,495.00 was transferred to CNB Account 5460. Both accounts are held in the name NYGDP Pawn Inc with SPRAGUE listed as the sole signor. The analysis of withdrawals from CNB Account 3464 shows SPRAGUE used the money, which constitutes proceeds of an SUA, to conduct monetary transactions in excess of \$10,000 in violation of Title 18 U.S.C. § 1957, which are detailed in the following chart: (this chart represents only a sample of the violations of Title 18 U.S.C. § 1957 violations related to this account and is not all inclusive).

Account Number	Date of Transaction	Amount of Transfer	Description
1107643464	03/31/2022	\$ 30,000.00	Withdrawal Internet Transfer to XXXXXX5460 - Nygd to SSQ March 22 invoi
1107643464	04/07/2022	\$ 14,000.00	Withdrawal Internet Transfer to XXXXXX5460 - SSQ to NYGD March 22 invoi
1107643464	04/25/2022	\$ 19,700.00	Check-Inclearings 1132
1107643464	07/12/2022	\$ 20,700.00	Withdrawal Internet Transfer to XXXXXX5460 - SSQ paying NYGD June invoi
1107643464	08/09/2022	\$ 15,000.00	Withdrawal Internet Transfer to XXXXXX5460 - July 2022 bill 20k paid 15
1107643464	09/02/2022	\$ 14,200.00	Withdrawal Internet Transfer to XXXXXX5460 - August 2022 inventory invo
1107643464	10/03/2022	\$ 16,000.00	Withdrawal Internet Transfer to XXXXXX9825 - loan 16k on 10 3 2022
1107643464	10/03/2022	\$ 10,720.00	Eff. 10-01 Withdrawal Internet Transfer to XXXXXX5460 0 - September 2022 Invoice 107
1107643464	11/04/2022	\$ 14,000.00	Withdrawal Internet Transfer to XXXXXX5460 - October 2022 inventory 30k
1107643464	11/08/2022	\$ 16,000.00	Withdrawal Internet Transfer to XXXXXX5460 - paid 16k balance from Octo
1107643464	12/02/2022	\$ 20,000.00	Withdrawal Internet Transfer to XXXXXX5460 - Novembe r 2022 invoice 55k
1107643464	12/30/2022	\$ 11,800.00	Withdrawal Internet Transfer to XXXXXX9825 - Decembe r 2022 payroll and
1107643464	01/10/2023	\$ 61,000.00	Withdrawal Internet Transfer to XXXXXX4704 - Decembe r 2022 Invoice pa
1107643464	02/02/2023	\$ 42,000.00	Withdrawal Internet Transfer to XXXXXX4704 - January 2023 invoice 62k m
1107643464	02/07/2023	\$ 20,000.00	Withdrawal Internet Transfer to XXXXXX4704 - January 2023 Invoice balan
1107643464	02/17/2023	\$ 20,000.00	Withdrawal Internet Transfer to XXXXXX9825 - 20k loan for inventory Feb
1107643464	04/03/2023	\$ 41,000.00	Eff. 04-02 Withdrawal Internet Transfer to XXXXXX4704 - March invoice inventory
1107643464	04/17/2023	\$ 10,409.00	Check-Inclearings 1109
1107643464	05/05/2023	\$ 39,597.00	Withdrawal Internet Transfer to XXXXXX4704 - invento ry April 2023 balan

1107643464	06/05/2023	\$ 43,000.00	Eff. 06-04 Withdrawal Internet Transfer to XXXXXX4704 - inventory May invoice
1107643464	07/03/2023	\$ 43,000.00	Eff. 07-01 Withdrawal Internet Transfer to XXXXXX4704 - invoice paid for June 2023
1107643464	08/01/2023	\$ 31,000.00	Withdrawal Internet Transfer to XXXXXX4704 - July invoice from NYGD to
1107643464	11/01/2023	\$ 40,306.00	Withdrawal Internet Transfer to XXXXXX4704 - October Inventory invoice
1107643464	12/01/2023	\$ 48,250.00	Withdrawal Internet Transfer to XXXXXX4704 - November invoice 49250 bal
1107643464	01/04/2024	\$ 32,800.00	Withdrawal Internet Transfer to XXXXXX4704 - Dec invoice 49800 minus 32
1107643464	01/11/2024	\$ 17,000.00	Withdrawal Internet Transfer to XXXXXX4704 - December 2023 invoice bal
1107643464	02/02/2024	\$ 23,000.00	Withdrawal Internet Transfer to XXXXXX4704 - Inventory Jan 24 bal 55k
1107643464	02/02/2024	\$ 10,350.00	Withdrawal Internet Transfer to XXXXXX9825 - Payroll December 2023
1107643464	02/22/2024	\$ 45,000.00	Withdrawal Internet Transfer to XXXXXX4704 - January inventory paid off
1107643464	03/14/2024	\$ 30,000.00	Withdrawal Internet Transfer to XXXXXX4704 - February Inventory 41k bal
1107643464	04/05/2024	\$ 11,000.00	Withdrawal Internet Transfer to XXXXXX4704 - February inventory balance
1107643464	04/15/2024	\$ 42,000.00	Withdrawal Internet Transfer to XXXXXX4704 - March Inventory 2024
1107643464	05/13/2024	\$ 30,000.00	Withdrawal Internet Transfer to XXXXXX4704 - 31k April 2024 Invoice Bal
1107643464	03/01/2022	\$ 20,000.00	Withdrawal Internet Transfer to XXXXXX5460 - FEBUARY INVOICE 44K MINUS
1107643464	02/09/2022	\$ 22,568.00	Withdrawal January 2022 Inventory Invoice paid in full
1107643464	02/01/2022	\$ 16,287.00	Withdrawal Final bill from December 2021 paid in full

CNB Account 5460

132. The analysis of records relating to CNB Account 5460 show that the account was opened on or about February 1, 2018, in the name of NYGDP Pawn Inc with a primary address of 508 Stone Rd, Rochester, NY 14616. SPRAGUE is listed as the Sole Owner and authorized signor of CNB Account 5460. CNB Account 5460 was closed in January 2023 just after CNB Account 4704 was opened and began receiving deposits from CNB Account 3464.

133. During the time period of January 1, 2022, through January 17, 2023, CNB account 5460 received total deposits of approximately \$557,076.39, of which approximately \$324,495.00 of those deposits are traceable to sales from eBay account “ampletools” that were originally deposited into CNB Account 2000 and/or 6079.

134. An analysis of the withdrawals from CNB Account 5460 for the time period January 1, 2022, through January 2023, indicates that SPRAGUE withdrew some of the SUA proceeds from the eBay sales in the form of cash as detailed in the following chart:

Account Number	Date of Transaction	Amount of Withdrawal	Description
1107045460	02/01/2022	\$ 9,000.00	Withdrawal
1107045460	05/12/2022	\$ 20,000.00	Withdrawal
1107045460	05/27/2022	\$ 5,000.00	Withdrawal
1107045460	06/01/2022	\$ 10,000.00	Withdrawal
1107045460	07/12/2022	\$ 13,000.00	Withdrawal
1107045460	11/04/2022	\$ 3,000.00	Withdrawal
1107045460	11/08/2022	\$ 10,000.00	Withdrawal
1107045460	11/09/2022	\$ 8,000.00	Withdrawal
1107045460	12/02/2022	\$ 5,000.00	Withdrawal
1107045460	12/08/2022	\$ 5,000.00	Withdrawal

135. Based on my training and experience with similar investigations, secondhand dealers primarily use cash to purchase secondhand items. It is my belief that SPRAGUE and CIVILETTI used the withdrawn currency to pay the LARCENISTS and other boosters to purchase more stolen items brought into NYGDP and list and sell those items on eBay, therefore perpetuating and promoting the SUAs, namely wire fraud in violation of 18 U.S.C. § 1343, and the transportation and sale of stolen goods, in violation of 18 U.S.C. §§ 2314 and 2315.

136. SPRAGUE and CIVILETTI knowingly conducted and/or caused to be conducted the above financial transactions affecting interstate commerce, that is, the withdrawal of funds by, through, and to financial institutions engaged in and the activities of which affected interstate and foreign commerce, which represented the proceeds of a specified unlawful activity, that is, wire fraud in violation of 18 U.S.C. § 1343, and the transportation and sale of stolen goods, in violation of 18 U.S.C. §§ 2314 and 2315 with the intent to promote the carrying on of specified unlawful activity. While conducting these financial transactions, SPRAGUE and CIVILETTI knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 1956(h).

CNB Account 4704

137. The analysis of records relating to CNB Account 4704 show that the account was opened on or about December 5, 2022, in the name of NYGDP Pawn Inc with a primary address of 512 Stone Rd, Rochester, NY 14616. SPRAGUE is listed as the Sole Officer and authorized signor of CNB Account 4704.

138. During the time period of December 5, 2022, through August 19, 2024, CNB account 4704 received total deposits of approximately \$1,717,291.42, of which approximately \$858,445.50 of those deposits are traceable to sales from eBay account “ampletools,” that were originally deposited to CNB Account 2000 and/or 6079.

139. An analysis of the withdrawals from CNB Account 4704 for the time period December 5, 2022, through August 19, 2024, indicates that SPRAGUE withdrew some of the SUA proceeds in the form of cash as detailed in the following chart:

Account Number	Date of Transaction	Amount of Withdrawal	Description
1109174704	01/17/2023	\$ 20,000.00	Withdrawal
1109174704	11/14/2023	\$ 18,000.00	Withdrawal
1109174704	01/09/2024	\$ 10,000.00	Withdrawal
1109174704	01/11/2024	\$ 10,000.00	Withdrawal
1109174704	01/12/2024	\$ 13,000.00	Withdrawal
1109174704	01/22/2024	\$ 7,000.00	Withdrawal
1109174704	02/27/2024	\$ 20,000.00	Withdrawal
1109174704	06/20/2024	\$ 12,000.00	Withdrawal
1109174704	06/28/2024	\$ 6,000.00	Withdrawal

140. Based on my training and experience with similar investigations, secondhand dealers primarily use cash to purchase secondhand items. It is my belief that SPRAGUE and CIVILETTI used the withdrawn currency to pay the LARCENISTS and other boosters to purchase more stolen items brought into NYGDP and list and sell those items on eBay, therefore perpetuating and promoting the SUAs, namely wire fraud, in violation of 18 U.S.C. § 1343, and the transportation and sale of stolen goods, in violation of 18 U.S.C. §§ 2314 and 2315.

141. SPRAGUE and CIVILETTI knowingly conducted and/or caused to be conducted the above financial transactions in and affecting interstate commerce, that is, the withdrawal of funds by, through, and to financial institutions engaged in and the activities of which affected interstate and foreign commerce, which represented the proceeds of a specified unlawful activity, that is, wire fraud, in violation of 18 U.S.C. § 1343, and the transportation and sale of stolen goods, in violation of 18 U.S.C. §§ 2314 and 2315 with the intent to promote the carrying on of specified unlawful activity. While conducting these financial transactions, SPRAGUE and CIVILETTI knew that the property involved in the financial transactions

represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and 1956(h).

142. BANKS, REEVES, and LEWIS, JR. continue to commit coordinated thefts. On October 10, 2024, they were observed working together in a larceny from Home Depot in Irondequoit.

143. NYGDP continues to purchase stolen, new-in-box items from Chanc LEWIS, with the last sale having taken place on October 8, 2024.

CONCLUSION

144. Based upon the forgoing, the undersigned respectfully submits that there is probable cause to believe that BANKS, REEVES, LEWIS, JR., LEWIS, SPRAGUE, and CIVILETTI, in the Western District of New York and elsewhere, have committed and conspired to commit violations of 18 U.S.C. § 1343 (Wire fraud); 18 U.S.C. § 1349 (Conspiracy to commit wire fraud); 18 U.S.C. §§ 2314 and 2315 (Transportation and sale of stolen goods in interstate commerce); 18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(h), and 1957 (Money laundering); and 18 U.S.C. § 371 (Conspiracy to commit the above-listed offenses).

145. In furtherance of the crimes listed above, BANKS, in her individual capacity, has also committed Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A.

146. Because this investigation is continuing, disclosure of the complaint, application, this affidavit, and/or the attachments thereto will jeopardize the progress of the investigation. Accordingly, the undersigned respectfully requests that the Court issue an order

that the search warrant, application, this affidavit, and all attachments thereto be filed under seal until further order of this Court.



Joshua Aldinger
Task Force Officer
Homeland Security Investigations

Affidavit submitted electronically by email in .pdf format. Oath administered, and contents and signature attested to me as true and accurate telephonically pursuant to Fed. R. Crim. P. 4.1 and 4(d) on October 11, 2024.



MARK W. PEDERSEN
UNITED STATES MAGISTRATE JUDGE